

# WESTERN OREGON UNIVERSITY

TO: RCE RSA Scholars  
FROM: Cheryl Davis, Director  
Regional Resource Center on Deafness  
DATE: September 23, 2011

RE: Key terms and policies regarding the enforcement of RSA Service Obligations

Disclaimer: Information provided here is meant to help RSA scholars understand the current implantation of the regulations. Scholars should refer to the regulations posted on the RCE website. If any information contradicts that found in the regulations, the regulations should be followed.

## **Service Obligation**

RCE students who accept the financial assistance from Rehabilitation Services Administration (RSA) are required pay back the aid with work. RSA refers to them as *RSA scholars*. For every academic year of assistance, the RSA Scholar is required to work two calendar years full time equivalent in a **qualifying employment** setting. This is called the payback or *service obligation*. The work must be paid work. Unpaid or volunteer work does not count. Please note: Fall, Winter, Spring constitutes an academic year. scholars who received support in all three terms would owe back in work two full calendar years (24 months). Scholars who attend summer school do not incur any additional service obligation.

## **Qualifying Employment**

According to RSA *it is not enough that a position requires scholars to use skills they learned in the Rehabilitation Counseling graduate program or that the work scholars do simply benefits consumers of vocational rehabilitation services*. The services the organization offers must be provided at the behest of the vocational rehabilitation agency to assist the vocational rehabilitation consumer in completing the goals established in their individual plan of employment. For example, a benefits advisor with the Social Security Administration may provide valuable benefits information to a consumer of vocational rehabilitation services; however, this service is not provided because of an agreement with the vocational rehabilitation agency and it does not assist the vocational rehabilitation consumer in completing the goals established in his or her individual plan of employment. This job is not a qualifying position. A mental health counselor, on the other hand, may assist a consumer of vocational rehabilitation services with adjustment issues which would address goals in the consumer's individual plan for employment. This job is a qualifying position.

## **Grace Period**

RSA recognizes that when RSA scholars graduate, they may not immediately obtain a job. They allow scholars two years to locate work. This is referred to as a *grace period*. However, if a scholar exits the program for any reason prior to graduation, RSA does not allow the two year grace period. This means that the scholar would enter **monetary repayment** immediately, unless he or she was employed in a qualifying position.

## **Monetary Repayment and examples**

RSA scholars are financially responsible for paying back their scholarships unless they work in qualifying settings according to the timelines set out in 34CFR386 or are granted an exemption. When scholars pay back their scholarship in cash instead of work, this is called *monetary repayment*.

Scholars must enter monetary payback at the point at which any of the following statements becomes true (34 CFR 386.43):

*a) if your employment goals do not include working in a qualifying setting:*

AJ graduated from the program in June, but by September realized that his career interests had changed. He has decided to enter a career that is not related to vocational rehabilitation. He must notify us of this change in his status so that we can submit the appropriate documentation. He would enter repayment status immediately.

*b) if your two year grace period has run out and you have not found qualifying employment:*

TR graduated from the program in June, 2008. Because of life circumstances he does not want to relocate to another city or state. He has been unable to find employment in a qualifying setting where he lives. He reported on his annual service obligation form that he had not found work. He entered repayment in June, 2010. Note: He would still have four years to continue looking for work. If he found qualifying employment, he could work to decrease the total amount service obligation he owed, but he would be repaying at the same time.

*c) anytime you are unable to complete your service obligation in the time you have remaining on your service obligation "clock:"*

ME graduated from the program in June, 2008 and worked until June, 2010 full time. In July, his needs changed and he began working part time. Because he was working part time, it would take him four years to complete the two years of full time equivalent work. Because he would not be able to complete his work obligation before the time runs out, he would enter repayment. He will stay in touch with RSA and WOU regarding his employment. As he continues to work, the amount he owes will be decreased even though he has already started repaying his debt.

*d) if you exit the program prior to graduation:*

RSA does not allow a grace period for RSA scholars who exit the program without graduating; however, scholars are able to work off the service obligation in a qualifying setting.

### **Deferral Requests**

There are a few circumstances where a deferral can be requested, such as if the scholar becomes temporarily totally disabled (not to exceed three years), if he or she becomes a full time student, or needs to care for a disabled spouse (not to exceed 12 months) (see 34 CFR 386.41 for the complete list). *This must be approved from RSA.* If any of these circumstances apply to scholars during the service obligation period, it is their responsibility to contact Dr. Davis. She will facilitate the request to RSA.

### **Exemption Requests**

Exemptions are only allowable in the case of permanent disability or if the scholar has died. If any of these circumstances apply during the service obligation period, it is the scholar's responsibility to contact Dr. Davis. She will facilitate the request to RSA for the exemption.

### **Address Changes**

Please note that RSA has advised Dr. Davis that if she is unable to locate scholars or if they do not respond to the annual requests for updates on their employment, she is obligated to submit their files to RSA for repayment at that time. **Please be sure to update Dr. Davis with current mailing and e-mail addresses, and to return the service obligation forms on time!** If there are any questions, please feel free to contact Dr. Davis at 503-838-8053 or [davisc@wou.edu](mailto:davisc@wou.edu).